

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**Civil Action No.: 05-10448-GAO**

|                                |   |
|--------------------------------|---|
| JOANNE M. ROYER,               | ) |
|                                | ) |
| Plaintiff,                     | ) |
|                                | ) |
| v.                             | ) |
|                                | ) |
| BLUE CROSS BLUE SHIELD         | ) |
| OF MASSACHUSETTS, INC., et al. | ) |
|                                | ) |
| Defendants.                    | ) |
|                                | ) |

**RULE 16.1(D)(3) CERTIFICATE**

Undersigned counsel, who is Deputy General Counsel and Vice-President of defendant Blue Cross and Blue Shield of Massachusetts, Inc. ("Blue Cross"), certifies that Blue Cross has considered a) a budget for the costs of conducting the full course and various alternative courses of this litigation, and b) resolution of the litigation through the use of alternative dispute resolution programs.

/s/ Joseph Halpern  
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